



General Services Administration, Region 10
PBS, Puget Sound Field Office
GSA Center
400 15th Street SW
Auburn, WA 98001-6599

AUG 13 1993

Jeannie Summerhays
State of Washington
Department of Ecology
3190 - 160th Ave. SE
Bellevue, WA. 98008-5452

RECEIVED

AUG 16 1993

DEPT. OF ECOLOGY

Dear Ms. Summerhays:

Re: Inspection letter June 7, 1993
GSA Federal Center South - WA8470031891

This letter is in response to your inspection report dated 6-7-93. We have responded to each item and enclosed supporting documentation.

1. GSA hazardous waste transportation and disposal.

We will no longer combine our hazardous waste with any other agency on or off site. As a small quantity generator, we will not accumulate more than half a barrel of hazardous waste on-site before having it removed. Transportation and disposal will be contracted to a qualified hazardous waste transporter that has an EPA/State Identification Number. The (TSD) facility will be directed to recycle or reclaim as much of the waste as possible.

Additional comments:

1. Generator Status - GSA as the property owner, operates the facility for the various tenants as a building management function. GSA limits its activities, on this site, to those which are consistent with the typical commercial building operation and maintenance.
2. Site Identification Number - No other agency will be allowed to use the GSA site number.

USEPA SF



1215065

3. Notification to Agency's - We will write each agency reminding them, if they are generating or transporting hazardous waste through this facility, it is their responsibility to comply with all EPA regulations as a hazardous waste generator.
4. Manifest Procedures - We will insure that all hazardous waste generated by GSA at the site, will be identified as GSA Federal Center South on the manifest.
5. Segregation of Wastes - Oils will be kept separated from other waste.
6. Treatment Solutions - MSDS sheets are attached for each chemical used in the water treatment program.

Product MXT-1 is considered a nonhazardous waste according to the MSDS provided.

Product DOS-1, is considered hazardous in concentrated form but the manufacturer indicates it is not hazardous when used according to the instructions i.e., when diluted and discharged through the metro treatment system.

The company providing the water treatment products is CH20 of Olympia, Washington. They have been good enough to provide a complete waste characterization but have asked us to refrain from divulging the specifics of the information.

There are two applications of the water treatment; 1) the tower; and 2) the closed system.

Of the nine compounds constituting the waste water from the tower, three would be considered corrosive when applied but are neutralized (maximum pH has been determined to be between 8 and 8.5) or diluted prior to discharge. In addition, they are present at only 5 to 10 ppm.

The MSDSs indicate that none of the products contain carcinogenic compounds. Also, none of the products are reactive or flammable. None of the compounds are listed in chapter 173-303 WAC.

Given that neither the tower nor the closed system wastes fit the definition of hazardous material, the discharge from the water treatment system is considered nonhazardous.

7. Containment Area Oil/Water Separator

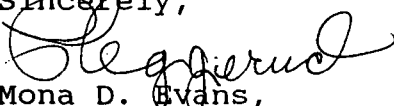
The containment area is designed to capture the spilled oil which would then be cleaned up and disposed of properly.

Rain water which will also accumulate in the containment area is periodically drained off by manually opening a gate valve allowing the water to flow through an oil separator and in to the storm drainage system. Any oil picked up by the separator would also be removed and disposed of properly.

See attached Spill Prevention Control and Countermeasures Plan.

If you have any questions or require further clarification, please call Roger Wright or me at 931-7884.

Sincerely,


for Mona D. Evans,
Field Office Manager